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September 27, 2024

Via ECF
Honorable Allyne Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Feng Jiang
24-CR-264

Your Honor,

I represent defendant Feng Jiang in the above-referenced matter. I write to respectfully request that the court appearance scheduled for this Tuesday, October 1, 2024, be adjourned for 45 days. This appearance will be the second one before Your Honor and no previous adjournment requests have been filed in the past.

The government has turned over voluminous discovery which is currently under review and the parties are currently engaged in ongoing plea discussions. We do not believe, however, that these discussions will be complete by Tuesday's appearance. I believe that this adjournment is in my client's best interest and that the ends of justice served by granting it outweigh the best interest of the public and my client in a speedy trial. Accordingly, I respectfully request that this adjournment, if granted, be excluded for speedy trial purposes.

I have spoken with AUSA Patrick Campbell and he consents to this request.

Respectfully submitted,



David Scott Smith, Esq.

Cc: AUSA Patrick Campbell (via ECF)